

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DANIEL ALHOLM, individually and on)
behalf of those similarly situated,)
)
)
Plaintiff,) Case No. 1:22-cv-01820
)
)
)
v.)
)
THE VRDOLYAK LAW GROUP, LLC,)
)
)
Defendant.)

DEFENDANT'S UNOPPOSED MOTION TO EXTEND DEADLINE

Defendant Vrdolyak Law Group (“VLG” or the “Firm”), through its undersigned counsel, submits the following motion to extend its deadline to file a responsive pleading to Plaintiff’s Complaint.

1. Plaintiff filed his Complaint on April 7, 2022 but did not serve it upon Defendant.
2. Plaintiff sought waiver of service from Defendant’s counsel on April 15, 2022.

Defendant’s counsel waived service on the same day.

3. Pursuant to Federal Rule of Civil Procedure 4(d), Defendant currently has until June 14, 2022 to file its responsive pleading to Plaintiff’s complaint.

4. On May 9, 2022, the Court ordered the Parties to submit a joint status report by June 17, 2022, and to attend an initial telephone conference on June 23, 2022. (Dkt. 5.)

5. Defendant respectfully requests that the Court grant it a limited 21-day extension to its deadline to file a responsive pleading, which will allow the Parties to cooperate on their initial status report, determine the nature and scope of Defendant’s responsive pleading(s), and appear before the Court where a further briefing schedule can be agreed upon.

6. This motion is not brought for purposes of delay, and Plaintiff does not oppose this motion.

WHEREFORE, Defendant VLG respectfully requests that this Court grant its motion to extend its deadline to file its responsive pleading to Plaintiff's Complaint, enter a new responsive pleading deadline of July 5, 2022, and award any further relief in favor of VLG it deems just and equitable under the circumstances.

Respectfully submitted,

/s/ Robert D. Sweeney
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Counsel for Defendant Vrdolyak Law Group, LLC

CERTIFICATE OF SERVICE

I hereby certify that on June 13, 2022, I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all parties of record.

/s/ William O'Hara _____